

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff

v.

UNITED AIRLINES, INC.,

Defendant.

CIVIL ACTION NO. 5:18-cv-817

**UNITED AIRLINES, INC.’S RESPONSE TO MOTION OF JANE DOE
TO PROCEED UNDER A PSEUDONYM**

Defendant United Airlines, Inc. (“United”), by and through its attorneys, files this response to Motion of Jane Doe To Proceed Under a Pseudonym (“Motion”), in which Proposed Intervenor Jane Doe has moved for permission to proceed under a pseudonym should she be permitted to intervene in this matter. *See* Dkt. 13, Motion.

In her Motion, Jane Doe relies heavily on statements made during proceedings in which United was not a party and thus United has little, if any, basis for assessing the accuracy of those statements. However, without conceding any factual predicates for the Motion, and reserving all rights to contest them in the anticipated litigation, United does not oppose Jane Doe’s motion to proceed under a pseudonym should the Court grant her motion for leave to intervene.

DATED: December 3, 2018

Respectfully submitted,
UNITED AIRLINES, INC.

By: s/Ada W. Dolph

Ada W. Dolph (*admitted pro hac vice*)
adolph@seyfarth.com
Gerald L. Pauling (*admitted pro hac vice*)
gpauling@seyfarth.com
Seyfarth Shaw LLP
233 S. Wacker Drive, Suite 8000
Chicago, Illinois 60606
Telephone: (312) 460-5000
Facsimile: (312) 460-7000

Kathryn C. Palamountain
cpalamountain@seyfarth.com
Texas State Bar No. 24061004
Seyfarth Shaw LLP
700 Milam Street, Suite 1400
Houston, Texas 77002-2812
Telephone: (713) 225-2300
Facsimile: (713) 225-2340

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on December 3, 2018, I caused a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following at their e-mail addresses on file with the Court:

Robert A. Canino (robert.canino@eeoc.gov)
Edward Juarez (eduardo.juarez@eeoc.gov)
Philip Jonathan Moss (philip.moss@eeoc.gov)
U.S. Equal Employment Opportunity Commission
San Antonio Field Office
5410 Fredericksburg Road, Suite 200
San Antonio, Texas 78229-3555

s/Ada W. Dolph

One of the Attorneys for
UNITED AIRLINES, INC.